

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE THE MATTER OF:

KATHLEEN LOOMIS,

Debtor.

)
)
) Case No. 20 B 02760
) Chapter 13
) Judge: Hunt
) Trustee: Stearns
) ***JOLIET CASE***

NOTICE OF MOTION

TO: Glenn Stearns, Trustee	Kathleen Loomis
801 Warrenville Road	924 N. Raynor
Suite 650	Joliet Illinois 60435
Lisle, Illinois 60532	(Via USPS first class mail and
(Via Electronic Service through ECF)	Certified Mail)

ALL MEMBERS OF ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on June 3, 2022 at 10:15 a.m., I will Appear electronically using Zoom for Government before the Honorable LaShonda A. Hunt or any judge sitting in her place, and present the *Motion to Withdraw as Attorney of Record*, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

Meeting ID and passcode. The meeting ID for this hearing is **161 165 5696** and the passcode is **7490911**. Additional information can be found on Judge Hunt's webpage on the court's website: <https://www.ilnb.uscourts.gov/content/judge-lashonda-hunt>

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Timothy Bell
Timothy Bell

Attorney for the Debtor
Law Office of Sara J. Gray
1429 Plainfield Rd.
Joliet, Illinois 60435
(815) 723-4543 (Office)
(630) 749-1440 (Fax)
debtfreeillinois@gmail.com

CERTIFICATE/PROOF OF SERVICE

I, TIMOTHY BELL, certify and declare under penalty of perjury under the laws of the United States of America that I served a copy of the above Notice of Motion and Motion by either electronic notice through ECF or mailing same to the above-named persons and persons on the attached service list by depositing same in the U.S. Mail at 1429 Plainfield Rd., Joliet, Illinois 60435 at or by 5:00 p.m. May 17, 2022, or by Certified Mail where indicated.

/s/ Timothy Bell
TIMOTHY BELL
Attorney for Debtor

Timothy Bell
Attorney for the Debtor
Law Office of Sara J. Gray
1429 Plainfield Rd.
Joliet, Illinois 60435
(815) 723-4543 (office)
(630) 749-1440 (fax)
debtfreeillinois@gmail.com

~~SERVICE LIST~~

American InfoSource LP
Presence Health
PO Box 248838
Oklahoma City, OK 73124

Illinois Department of Employment S
Benefit Payment Control Division
P O Box 4385
Chicago, IL 60680

Presence Health
c/o American Infosource
PO Box 248838
Oklahoma City, OK 73124

Capital One Auto Finance
PO Box 9013
Addison, TX 75001

Illinois Department of Revenue
Bankruptcy Unit
PO Box 19035
Springfield, IL 62794

Presence Health
c/o American Infosource
PO Box 248838
Oklahoma City, OK 73124

Cashstore
1701 N Larkin Ave Ste 901
Crest Hill, IL 60403

Illinois Tollway
Attn: Violation Administration
2700 Ogden Ave
Downers Grove, IL 60515

Santander Consumer USA
PO Box 961245
Fort Worth, TX 76161

Comenity Bank
PO Box 182789
Columbus, OH 43218

Internal Revenue Service
Centralized Insolvency Operation
Post Office Box 7346
Philadelphia, PA 19101-7346

Security Credit Services
306 Enterprise Drive
Oxford, MS 38655

Credit Management LP
4200 International Parkway
Carrollton, TX 75007

Joliet Doctors Inc
c/o Collection Professionals
PO Box 416
La Salle, IL 61301

SFC of Illinois, LLC
d/b/a Security Finance
1124 Columbus
Ottawa, IL 61350

Dr. Ahsan & Associates
c/o Collection Professionals Inc
PO Box 416
La Salle, IL 61301

Joliet Smile World
c/o Collection Professionals
PO Box 416
La Salle, IL 61301

Sprint Corp
Attn: Bankruptcy Dept
PO Box 7949
Overland Park, KS 66207

Fifth Third Bank
5050 Kingsley Drive
MD# 1MOCOP
Cincinnati, OH 45263

National Credit Adjust
327 W 4th Ave
Hutchinson, KS 67501

US Department of Education
PO Box 7860
Madison, WI 53707

G C Services
6330 Gulfston St
Houston, TX 77081

Portfolio Recovery Associates
120 Corporate Blvd
Suite 1
Norfolk, VA 23502

Harris & Harris
222 Merchandise Mart Plz
Chicago, IL 60654

Portfolio Recovery Associates
120 Corporate Blvd
Suite 100
Norfolk, VA 23502

Harris & Harris
111 W. Jackson Blvd.
Suite 400
Chicago, IL 60604

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NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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KATHLEEN LOOMIS,

Debtor.

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MOTION TO WITHDRAW AS ATTORNEY OF RECORD

NOW COMES the Debtor, KATHLEEN LOOMIS, by and through her Counsel, Law Office of Sara J. Gray, and moves this Court for Entry of a Court Order for Withdrawal of Attorney of Record, and in support thereof respectfully states as follows:

- 1) That on January 20, 2022, the Debtor, Kathleen Loomis, filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
- 2) On March 18, 2022, the Debtors case was dismissed for failure to make plan payments.
- 3) That on May 6, 2022, the Debtors case was reinstated, with the Automatic stay applying to all creditors, except as to the current landlord due to an eviction proceeding.
- 4) That there now exist irreconcilable differences which prevent debtors counsel from being able to continue providing legal services on her case.
- 5) That on Sunday May 15, 2022, Debtors Counsel received a text message from the Debtor terminating our services.

WHEREFORE, the Debtor respectfully requests this Honorable Court enter the following relief:

- A. That an Order be entered allowing the Law Office of Sara J Gray to be withdrawn as counsel of record.
- B. For any such further or additional relief that this Court may deem just and proper.

/s/ Timothy Bell

Timothy Bell

Attorney for the Debtor

Timothy Bell
Attorney for the Debtor
Law Office of Sara J. Gray
1429 Plainfield Rd.
Joliet, Illinois 60435
(815) 723-4543 (office)
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